

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE: THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
As representative of THE COMMONWEALTH
OF PUERTO RICO, ET AL.

Debtors

Case No. 17-BK-3283 (LTS)

(Jointly Administered)
PROMESA TITLE III

OPPOSITION TO OBJECTION TO CLAIM

TO THE HONORABLE COURT:

COMES NOW, DOWNTOWN DEVELOPMENT CORP (DDC) through the undersigned attorney and hereby enters its appearance and respectfully states and prays as follows:

1. On April 24th, 2023, Debtor objected (Doc# 24050) the claim number 29504 (1823) filed on 05/27/2018 filed by DDC in the amount of \$437,284.26, arguing that "Proof of claim purports to assert liability on the basis of submitted invoice(s). Based on a declaration attesting to a reasonable review of the agency's books and records , there are no outstanding liabilities associated with these invoices in the agency's system".

2. DDC right to the payment of the rents claimed interest had been perfected since May 27th, 2018, based on the Lease Agreement signed by Debtor on September 22th, 2011, as per contract number 2012-000030, filed at Volume 6, page 434 in the contract's registry of the Department of Transportation and Public Works of the Commonwealth of Puerto Rico (DTOP) (**see Exhibit 1 - Claim number 29504, page 18**); and as per the Registry of Contracts of the Office of the Comptroller of Puerto Rico, dispatch number 236452. **See Exhibit 1 - Claim number 29504, page 18.**

3. Claim 29405 includes the lease of account contained in the **Exhibit 1. - Claim number 29504, page 5.**

4. Debtor has had enough and clear evidence of the debt since May 27th, 2018 , and has not justified any reason to conclude that there are no outstanding liabilities associated with the claim documents.

WHEREFORE, it is respectfully prayed that this Honorable Court grant the Claim Number 29504 as amended, and deny Debtor's objection to Claim Number 29504.

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the objection will be deemed unopposed and may be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the court, the interest of justice requires otherwise. If you file a timely response, the court may, in its discretion, schedule a hearing.

I HEREBY CERTIFY: That on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of this filing to all parties in interest as per master address list.

In San Juan, Puerto Rico, this 22nd day of May, 2023.

/s/ Rosendo E. Miranda López,
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